IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FILED

FEB 17 2005

CLERK, U.S. DISTRICT COURT
By _____
Deputy

ORIGINAL
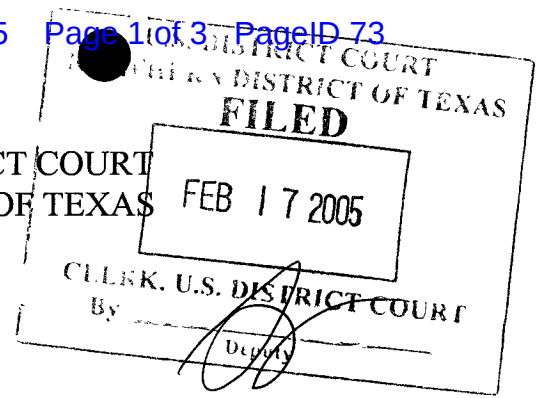
UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 3:04-CR-283-D (01)
	§	
THOMAS ALBERT JONES	§	

GOVERNMENT'S MOTION FOR AN ADDITIONAL ONE-LEVEL DECREASE FOR ACCEPTANCE OF RESPONSIBILITY

The United States, by and through the United States Attorney for the Northern District of Texas, moves the Court for a one-point decrease in defendant Thomas Albert Jones' (Jones) offense level.

Under United States Sentencing Guideline (USSG) section 3E1.1(b), the government requests that Jones receive an additional one-level reduction in his offense level. Jones notified the government of his intention to enter a guilty plea sufficiently early to permit the government to avoid preparing for trial and to allocate its resources elsewhere. Specifically, Jones saved the government considerable time and resources that necessarily would have been expended contacting, interviewing and possibly bringing to trial numerous minors with whom Jones communicated by computer; the time, money, and manpower that the United States Attorneys Office and the FBI would have been required to invest to prepare witnesses and trial exhibits; and made it unnecessary to call certain children as witnesses in this case.

Government's Motion for One
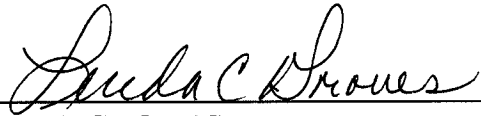**Point Decrease in Offense Level - Page 1**

The government reserves the right, however, to withdraw this motion if Jones

engages in or is found to have engaged in conduct inconsistent with acceptance of

responsibility.

Respectfully submitted,

RICHARD B. ROPER
UNITED STATES ATTORNEY

PAUL YANOWITCH
Assistant United States Attorney
Ill. Bar No. 6188269
1100 Commerce, Third Floor
Dallas, Texas 75242
Telephone: 214.659.8600
Facsimile: 214.767.2846

LINDA GROVES
Deputy Criminal Chief

CERTIFICATE OF SERVICE

I certify that on this /7/M day of February, 2005, a copy of the Government's

Motion for an Additional One-level Decrease for Acceptance of Responsibility was

served by hand delivery on defendant's attorney, Robert J. Herrington, at the following

address:

> Office of the Federal Public Defender
> 525 Griffin Street; Suite 629
> Dallas, TX

PAUL YANOWITCH
Assistant United States Attorney

**Government's Motion for One
Point Decrease in Offense Level - Page 3**